

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

<b>AETNA LIFE INSURANCE COMPANY,</b>	§	<b>JURY DEMANDED</b>
	§	
<b>Plaintiff,</b>	§	
	§	
<b>VS.</b>	§	<b>CIVIL ACTION NO. 4:15-CV-491</b>
	§	
<b>ROBERT A. BEHAR, M.D., NORTH</b>	§	
<b>CYPRESS MEDICAL CENTER</b>	§	
<b>OPERATING COMPANY, LTD. and</b>	§	
<b>NORTH CYPRESS MEDICAL CENTER</b>	§	
<b>OPERATING COMPANY GP, LLC,</b>	§	
	§	
<b>Defendants.</b>	§	

**JOINT NOTICE REGARDING PROPOSED DISCOVERY ORDER**

The parties in the above-captioned case file this Notice to inform the Court of the following:

1. The parties, through Mr. Shely and Mr. Kelly, are conferring on the form and content of a proposed Discovery Order concerning Defendants' Motion for Rehearing; Motion for Protective Order; and Motion to Tender to the Court In Camera Ordered Email Lists and Privileged Log (Dkt#116) and Defendants' Supplement to Motion for Rehearing (Dkt#122), as well as various other issues addressed at the hearing held on March 16, 2016.
2. Mr. Kelly is updating Mr. Shely on a regular basis regarding the status of North Cypress' searches for electronic documents responsive to Aetna's requests for production.
3. The parties are exploring ideas for the production of such documents in an efficient and complete manner.
4. Mr. Shely has requested that Mr. Kelly look into specific concerns regarding North Cypress' document production, and Mr. Kelly has agreed to do so and report back.

5. The parties will update the Court as necessary and will respond to any request from the Court.

Respectfully submitted

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**CERTIFICATE OF SERVICE**

This is to certify that a true and correct copy of the foregoing document has been served on all counsel of record in this matter via the Court's electronic case filing system on the 31st day of March, 2016, as follows:

*s/Jeffrey D. Migit*

Jeffrey D. Migit